This document includes Section 12.0, QST 35 Class: Navy and U.S. Coast Guard Spark Ignition Inboards, of the Draft EPA Report "Surface Vessel Bilgewater/Oil Water Separator Environmental Effects Analysis Report" published in 2003. The reference number is: EPA-842-D-06-018

DRAFT
Environmental Effects Analysis Report Surface Vessel Bilgewater/Oil Water Separator

Section 12.0 – QST 35 Class: Navy and U.S. Coast Guard Spark Ignition Inboards

2003

SECTION 12.0 – QST 35 CLASS

TABLE OF CONTENTS

12.0 QST 35 CLASS

12.1 INTRODUCTION

This Environmental Effects Analysis Report (EEAR) presents surface vessel bilgewater discharge from the Uniform National Discharge Standards (UNDS) vessel group, "Boats with SI Inboard Engines." This group consists of at least 78 boats powered with SI inboard engines. Two Coast Guard vessel classes and three Navy vessel classes make up this vessel group. The Navy target drone QST-35 Class, also known as TD 56 and 17MTD, was selected as the representative vessel class for the group. The class has 29 vessels in service, the second largest number in the group, and is equipped with four Mercruiser™ engines, which is the largest number of engines per boat in the group. For more information about the vessel group and the selection of the representative vessel class used in this environmental effects analysis (EEA), see *Vessel Grouping and Representative Vessel Class Selection for Surface Vessel Bilgewater/Oil-Water Separator Discharge* (Navy and EPA, 2001g).

Vessels in this group receive fluids in the bilge from condensation that forms on the interior hull, and from leaking propeller shafts, pump packing glands, piping, valves, and flanges. This fluid may be contaminated with oily substances used to power and lubricate the propulsion and auxiliary engines.

12.2 DIFFERENCES FROM THE EEA METHODOLOGY

The analysis of discharge information and the presentation of results in this report do not follow the methodology contained in *Environmental Effects Analysis Guidance for Phase II of the Uniform National Discharge Standards for Vessels of the Armed Forces* (Navy and EPA, 2000b). The rationale for deviating from the established methodology is described below.

As determined in the Bilgewater FIAR (Navy and EPA, 2002b), the CHT option is a feasible marine pollution control device (MPCD) for this vessel group (CHT is currently in use for this vessel group). Application of this MPCD option involves shoreside treatment of collected bilgewater at an NPDES-permitted facility, and thus results in no discharge of untreated bilgewater to the receiving waters. When this report was written, EPA and DoD anticipated that the level of analysis in this report would be sufficient to support choosing an appropriate MPCD performance standard for the QST 35 vessel group because CHT is expected to be the preferred option when applying the seven considerations under the Section 312(n) of the Clean Water Act (Navy and EPA, 2002b).

12.3 SUMMARY OF EEA RESULTS

There are only minimal anticipated impacts to receiving waters if Collection, Holding, and Transfer (CHT) is conducted appropriately. There will be no toxic constituents, conditions related to narrative water quality criteria (e.g., turbid water), non-indigenous species, or bioaccumulative contaminants of concern introduced directly to the receiving water. The only potential impact to the environment identified for this MPCD would result from the discharge of treated bilgewater to a properly permitted facility.

12.4 MPCD RANKING AND ASSOCIATED UNCERTAINTY

CHT is the preferred option for this vessel group because it is assumed to have the least environmental impact when compared to the other MPCD options. There may be uncertainty in this limited analysis in regard to how much, if any, bilgewater is mishandled during transfer. However, because process knowledge of pierside management indicates mishandling is not a common occurrence, a determination of the frequency of this occurrence and associated uncertainty was not performed. Regardless of this minor aspect of uncertainty, CHT is the preferred option due to its minimal impact on the environment.